

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	3:CR-18-0097
	:	
v.	:	(Judge Mariani)
	:	
ROSS ROGGIO	:	(Electronically filed)

**MOTION FOR ENLARGEMENT OF TIME
TO FILE OBJECTIONS TO PRESENTENCE REPORT**

Now comes the Defendant, Ross Roggio, by his attorney, Gino Bartolai, Esquire, and files the following Motion for Enlargement of Time to File Objections to the Presentence Report, and in support thereof avers the following:

1. On March 20, 2018, Roggio was charged in an Indictment with conspiracy to commit an offense against the United States, in violation of Title 18, United States Code, Section 371; violations of the Arms Export Control Act, Title 22, United States Code, Sections 2778(b) and (c); and the International Emergency Powers Act, Title 50, United States Code, Sections 1702 and 1705(c); smuggling goods from the United States, in violation of Title 18 United States Code Sections 554 and 2; wire fraud, in violation of Title 18, United States Code Section 1342; and money laundering, in violation of Title 18 United States Code, Sections 1956(a)(2)(A) and 2.

2. On March 23, 2018, Roggio appeared before Magistrate Judge Karoline Mehalchick for an initial appearance and arraignment and entered a plea of not guilty to the charges.

3. On February 15, 2022, Roggio was charged in a Superseding Indictment with two additional charges; Conspiracy to Commit Torture in violation of Title 18, U.S.C. Sections 2340 and 2340A (c), and Torture in violation of Title 18, U.S.C. Sections 2340, 2340(A)(a) and 2.

4. On February 17, 2022, Roggio was arraigned before Magistrate Judge Joseph F. Saporito on the Superseding Indictment and entered a plea of not guilty.

5. On May 19, 2023, following a jury trial, Roggio was convicted of all the aforementioned charges.

6. On August 3, 2023, a draft version of the Presentence Report was disclosed to the parties. The deadline for objections to the report is August 21, 2023.

7. The undersigned counsel met with Roggio on August 12, 2023, at the Lackawanna County Prison at which time Roggio acknowledged receiving the Presentence Report but refused to discuss it with counsel. Roggio has requested that the undersigned counsel file a motion to withdraw as counsel. Counsel intends to file said motion concurrent with the filing of the within motion.

8. Counsel is seeking an additional 14 days, or until September 4, 2023, so that the Court can consider Counsel's Motion to Withdraw.

WHEREFORE, the Defendant, Ross Roggio, respectfully requests that this Honorable Court issue an Order enlarging the time to file objections to the Presentence Report for 14 days or until September 5, 2023.

Respectfully submitted,

Date: August 21, 2023

s/Gino Bartolai
Gino Bartolai, Esquire
Attorney ID# PA 56642

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Attorney for Ross Roggio

CERTIFICATE OF CONCURRENCE

I, Gino Bartolai, Esquire, certify that on this date I contacted Todd K. Hinkley, Assistant United States Attorney, who advised that he does concur in the within **Motion for Enlargement**.

Date: August 21, 2023

s/Gino Bartolai
Gino Bartolai, Esquire

CERTIFICATE OF SERVICE

I, Gino Bartolai, Esquire, do hereby certify that I electronically served, via e-mail, a copy of the foregoing **Motion for Enlargement**, to the following

Todd K. Hinkley, Esquire
Assistant United States Attorney

and by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Ross Roggio

Date: August 21, 2023

s/Gino Bartolai
Gino A. Bartolai, Esquire